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400 Maryland Avenue, SW  
Washington, D.C. 20202

September 28, 2020

RE: Docket No. ED-2020-SCC-0122

To Whom It May Concern:

This letter is submitted on behalf of the 28 undersigned members and partners of the Postsecondary Data Collaborative (PostsecData) in response to the proposed annual data collection for the Higher Education Emergency Relief Fund (HEERF).<sup>1</sup> PostsecData is a nonpartisan coalition of organizations committed to the use of high-quality postsecondary data to improve student success and advance educational equity.

The COVID-19 pandemic, which has upended nearly every aspect of our nation's well-being, has profoundly disrupted the higher education experiences of nearly 20 million undergraduate and graduate students. Collecting reliable and timely information on these experiences is more important than ever. For this reason, PostsecData would like to thank the Department of Education (ED) for their thoughtful approach to data collection at institutions receiving funding through HEERF.<sup>2</sup>

Transparency is essential, especially in times of emergency. The proposed data collection will provide important information about how institutions used these funds to support students in crisis, manage operational strain, and the extent to which federal funding tackles racial and socioeconomic inequities. Specifically, the proposed form will allow for a better understanding of the number and dollar amounts of emergency financial aid grants awarded to students, the institutional expenditures supported by HEERF, and the student persistence and staffing at individual colleges and universities receiving HEERF.

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<sup>1</sup> Agency Information Collection Activities; Comment Request; Higher Education Emergency Relief Fund (HEERF) Data Collection Form. 85 FR 45629. (29 July 2020). Federal Register: The Daily Journal of the United States Government. Retrieved from: <https://www.federalregister.gov/documents/2020/07/29/2020-16429/agency-information-collection-activities-comment-request-higher-education-emergency-relief-fund>

<sup>2</sup> These comments are submitted primarily in response to the Federal Register notice related to HEERF data collections. Comments are also applicable to the Governor's Education Emergency Relief (GEER) fund collection to reflect a desire for consistency of reporting on data for institutions of higher education.

PostsecData strongly supports the collection of this critical information and offers the following recommendations, in order of priority.

- Publish data in a user-friendly, machine-readable format.
- Maintain and expand data disaggregation.
- Collect and publish data on a quarterly basis.
- Collect more detailed completion and withdrawal rates and employment figures.
- Include minor edits to questions on emergency financial aid grants to students and institutional funding under HEERF and consider collecting information about institutional data-sharing and use policies.

These proposed changes are described below and annotated as tracked edits and comments in the appendix.

**Publish data in a user-friendly, machine-readable format (high priority).**

PostsecData strongly recommends that ED make data generated through this collection publicly available in an accessible, user-friendly and machine-readable format. For instance, publishing quarterly reports on HEERF spending allocations on the Office of Federal Student Aid (FSA) Data Center website in a downloadable Excel or CSV file would maximize the utility of the information collected and be consistent with existing ED transparency efforts. Publishing the resulting data on ED’s website is critical to ensuring that students, families, policymakers, and taxpayers have access to relevant and comprehensive data to examine how institutions spent these funds and to inform future appropriations into these or other funds.

To facilitate publishing the data in this way, ED should consider the most efficient collection format, and may need to require institutions to submit data in a machine-readable format (such as a CSV or Excel file) or prohibit certain submission formats that are not conducive to transparency (such as a PDF or Word document). ED should draw on their experience collecting data through the Integrated Postsecondary Education Data System (IPEDS) as well as other data tools in order to identify the most efficient process. The technology used and requirements for data collection have important implications for the burden on institutions and effort for ED.

**Maintain and expand data disaggregation (high priority).**

Identifying the number of students and dollar amounts of emergency aid awarded through HEERF is a core component of the proposed data collection, and we encourage ED to maintain these questions in the final data collection instrument. Differentiating between funding to graduate and undergraduate students, Pell recipients, and full- and part-time students (question 6) will be essential in understanding who benefits from the emergency federal aid. The Pell disaggregate is especially important because it will provide information on how much emergency aid went to

students who were in an economically precarious position even before the onset of the pandemic. Pell recipients are likely to have been further burdened by COVID-19's economic and educational impact, so transparency about the extent of the support these students received will be of paramount importance to the higher education community in the years to come.

In addition to the disaggregates already included in the form, PostsecData strongly urges ED to require data to be disaggregated by race/ethnicity. The pandemic has disproportionately impacted the health and economic well-being of Black, Indigenous, and Latinx students, along with their families and broader communities, so disaggregating data on student emergency grants by race and ethnicity is critical to understanding the extent to which the federal funding is tackling these inequities. Institutions should have student race/ethnicity information readily available due to other required reporting (such as the IPEDS collection).

**Collect and publish data on a quarterly basis (high priority).**

At the time of submitting this letter, just seven months have passed since colleges first closed their doors in response to the pandemic in the United States. The rapid and continuous shifts in higher education in that short time make clear that annual reporting under HEERF may be insufficient and point to the need for more responsive data to help policymakers with their decision-making before it's too late. PostsecData recommends that institutions report HEERF data on a fiscal quarter schedule, consistent with other FSA data releases.

In the case that the Department maintains its annual reporting requirement, we recommend the addition of questions about the share of HEERF spending that occurs each quarter. Anecdotal reports indicate that some institutions have spent little to no HEERF funding yet, and consistent data about quarterly spending patterns are needed to illuminate these trends more accurately. This approach, in contrast to our suggestion of quarterly reporting, does not provide policymakers and other key stakeholders with actionable information in a timely manner but does allow for a retrospective analysis of fluctuations in the spending patterns of institutions over time.

**Collect more detailed completion and withdrawal rates and employment figures (medium priority).**

ED's proposed collection form includes questions intended to gauge the combined impact of the pandemic and HEERF grant support. Specifically, question 8 asks for the number of students who withdrew from the institution after receiving emergency financial aid grants. While we believe this information is useful and support its inclusion, ED could also consider how to incorporate reporting on withdrawal rates of students who did not receive emergency financial support to contextualize outcomes of HEERF recipients. Likewise, it may be helpful to include counts of

student completers and those still enrolled to gain a more thorough understanding of how HEERF-recipients and non-recipients are progressing in their education.

Similarly, question 9 asks for the number of full-time equivalent (FTE) positions as of the start of the pandemic and the end of the most recent reporting period. We believe this information will provide valuable insight into how institutional capacity has been impacted by the pandemic and associated stimulus funding provided through HEERF. However, we believe this information would be more useful if institutions were required to report separately the number of FTE instructional staff, non-instructional staff, and student undergraduate and graduate employees. Each of these categories serves a unique function for universities, and these categories are aligned with IPEDS reporting requirements making the additional burden in reporting more detailed employment figures minimal. More granular information would provide a way to assess how the distribution of staffing has changed in the aftermath of COVID-19.

**Include minor edits to questions on emergency financial aid grants to students and institutional funding under HEERF and consider collecting information about institutional data-sharing and use policies (low priority).**

First, PostsecData strongly supports data collection examining the processes institutions use to allocate emergency financial aid grants to students under HEERF and believes this data will be extremely important in evaluating these funding strategies in response to the pandemic. PostsecData would like to thank ED for including these questions and suggests several minor changes to question 3 of the data collection to further improve the efficacy and value of the HEERF data collection (included as tracked changes and comments in the Appendix).

Second, PostsecData strongly supports the collection of information on institutional expenditures using HEERF dollars. The information provided will be critical in understanding the institutional responses to the pandemic, and variation in these strategies. We urge ED to consider requiring two additional line item categories for institutional expenditures supported by HEERF dollars: 1) Revenue sharing contracts entered into by the institution to manage and implement the transition to distance learning, and 2) Marketing and communications spending.

Third, in the interest of student privacy, PostsecData would encourage collection of information regarding whether institutions communicated with students how their data would be collected, secured, and shared and for what purposes. We have included a suggestion for how this question might be framed in the Appendix.

The undersigned members and partners of PostsecData encourage the Department to adopt these recommendations as they finalize institutional guidance for reporting under HEERF. If you

have any questions, please contact Mamie Voight, vice president of policy research at the Institution for Higher Education Policy ([mvoight@ihep.org](mailto:mvoight@ihep.org) or 202-587-4967).

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Sincerely,

Achieve Atlanta  
Advance CTE  
Association of University Centers on Disabilities  
Center for American Progress  
Center for Law and Social Policy  
Clearinghouse on Women's Issues  
Excelencia in Education  
Future of Privacy Forum  
Georgetown University Center on Education and the Workforce  
Higher Learning Advocates  
Institute for Higher Education Policy  
Metal Manufacturing & Training Alliance  
National Association for College Admission Counseling  
National College Attainment Network  
National Down Syndrome Congress  
NASPA – Student Affairs Administrators in Higher Education  
New America Higher Education Program  
Nexus Research and Policy Center  
Public Insight Data Corporation  
Results for America  
Skills2Compete - Colorado  
State Higher Education Executive Officers Association  
The Education Trust  
The Institute for College Access and Success  
Third Way  
uAspire  
UnidosUS  
Young Invincibles

**APPENDIX: HEERF DATA COLLECTION FORM (VERSION 1 ONLY)**  
**POSTSECDATA COMMENTS SHOWN AS COMMENTS AND TRACK CHANGES**  
**Higher Education Emergency Relief Fund (HEERF) Data Collection Form**  
**(Both Student Aid and Institutional Portions under Section 18004 of the**  
**CARES Act)**

Version 7/22/2020

*There are 2 versions of the survey. The first version is for almost all the reporting institutions at the 6-digit OPEID. The second version is for the 34 branch campuses at the 8-digit OPEID level that are Minority Serving Institutions (MSIs) and received funds under Section 18004(a)(2) of the CARES Act, but their main campus is not designated as an MSI. This form will automatically present the appropriate version of the survey as soon the ID number of the institution or campus is entered.*

*This data collection form applies to the following HEER funds:*

- [Student Aid](#) (CFDA 84.425E)
- [Institutional Portion](#) (CDFA 84.425F)
- [Historically Black Colleges and Universities](#) (CDFA 84.425J)
- [American Indian Tribally Controlled Colleges and Universities](#) (CDFA 84.425K)
- [Minority Serving Institutions](#) (CDFA 84.425L)
- [Strengthening Institutions Program](#) (CDFA 84.425M)
- [Fund for the Improvement of Postsecondary Education](#) (CDFA 84.425N)

**Version 1. Annual Reporting: This report should be completed by the institution, meaning the campus or group of campuses that share the same 6-digit OPEID number.**

- 1) Institutional Identifiers, Contact Information, and URL for 30-day Fund Report
  - a) Institutional Information  
Name \_\_\_ <autofill from Postsecondary Education Participants System (PEPS)> \_\_\_\_\_  
OPEID (6-digit) \_\_\_\_\_
  - b) Who is the lead contact for the data collection?  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Phone: \_\_\_\_\_  
Email: \_\_\_\_\_
  - c) Provide the website(s) URLs for the 30-day Fund Report posted by your campus, or by the institution on behalf of your campus(es), as required by the May 6, 2020 Electronic Announcement.<sup>3</sup>
    - i) \_\_\_\_\_

<sup>3</sup> <https://ifap.ed.gov/electronic-announcements/050620HigherEdEmergencyReliefFundRptg>

- ii) \_\_\_\_\_
- iii) \_\_\_\_\_
- iv) \_\_\_\_\_

- 2) How did your institution determine which students were eligible to receive emergency financial aid grants under any of the CARES Act programs? (*select all that apply*)
- a) My institution has a valid Institutional Student Information Record (ISIR) or Student Aid Report (SAR) on file that verifies student eligibility for Title IV, federal student aid (title IV aid).
  - b) My institution allowed students to attest to their eligibility for title IV aid by completing a form or questionnaire.
  - c) My institution used another method for determining which students were eligible to receive emergency financial aid grants under the CARES Act. Please describe:  
\_\_\_\_\_

- 3) For your institution, which of the following best describes how your institution distributed emergency financial aid grants to students (i.e., how did your institution determine which students received emergency financial aid grants and how much each student would receive?)?

- Did you distribute different amounts to eligible students based on different circumstances? \_\_\_\_\_(Y/N). If yes, respond to the following questions:
  - Did you ask students to apply for funds? (Y/N) If 'yes', did you use that application to determine the amount of a student's emergency financial aid grant? \_\_\_\_\_(Y/N). If yes, what factors did you prioritize to determine the amount of the student's award?
    - Student's difficulty with food expenses\_\_\_\_ (Y/N)
    - Student's difficulty with housing expenses\_\_\_\_\_ (Y/N)
    - Student's difficulty with course material expenses \_\_\_\_\_ (Y/N)
    - Student's difficulty with technology expenses\_\_\_\_\_ (Y/N)
    - Student's difficulty with health care expenses \_\_\_\_\_ (Y/N)
    - Student's difficulty with child care expenses \_\_\_\_\_(Y/N)
    - Difficulty with other expenses related to cost of attendance \_\_\_\_\_(Please explain)
    - Other \_\_\_\_\_(Please explain)
  - Were students required to submit documentation of these expenses and/or their difficulty meeting them? (Y/N)
    - If so, please explain what types of documentation were required.  
\_\_\_\_\_

- Did you use any institutional administrative data (pre-existing data that did not come from a HEER-specific application form) in determining the

amount of funds awarded to students? \_\_\_\_\_(Y/N). If 'yes', which of these student factors did you prioritize in the grant determination process? (Mark all that apply or describe for *other*)

- Enrollment intensity (i.e., full-time/part-time status) \_\_\_\_\_(Y/N).
- Location (i.e., branch campus) \_\_\_\_\_(Y/N).
- Pell Grant eligibility \_\_\_\_\_(Y/N).
- FAFSA data elements  \_\_\_\_\_(Y/N).
  1. FAFSA Family Income \_\_\_\_\_(Y/N).
  2. Estimated Family Contribution \_\_\_\_\_(Y/N).
  3. independent/dependent status \_\_\_\_\_(Y/N).
- On-campus/distance education status \_\_\_\_\_(Y/N).
- On-campus/off-campus living arrangements \_\_\_\_\_(Y/N).
- Academic level \_\_\_\_\_(Y/N).
- Other \_\_\_\_\_
- Were any new academic requirements expected of students who received emergency funds? (Y/N).
  - If yes, please explain \_\_\_\_\_.

4) How did your institution distribute the emergency financial aid grants to students?

- a) Checks \_\_\_\_\_ (Y/N).
- b) Electronic funds transfer /Direct deposit \_\_\_\_\_(Y/N).
- c) Debit cards \_\_\_\_\_ (Y/N).
- d) Payment apps \_\_\_\_\_ (Y/N).
- e) Other \_\_\_\_\_

5) Did your institution provide any instructions, directions, or guidance to students about the emergency financial aid grants? \_\_\_\_\_(Y/N)

If 'yes', then

- a) <upload PDF/MS Word document instructions, directions, or guidance>  
or
- b) Provide URL with instructions, directions, or guidance  
\_\_\_\_\_

6) Did your institution provide any details on what data would be collected in connection with emergency financial aid grants, how that data will be used, secured, managed, and shared by the institution or its partners, and the length of emergency financial aid data retention?

If 'yes', then

- a) <upload PDF/MS Word document instructions, directions, or guidance>

or

b) Provide URL with instructions, directions, or guidance

## Emergency Financial Aid Grants to Students

7) Use the instructions noted in the Appendix I to complete the following table.

Emergency Financial Aid Grants Awarded to Students (direct grants and amounts reimbursed)								
		All HEERF Emergency Financial Aid Grant eligible students	Undergraduates <sup>4</sup>				Graduates	
			Full-time students <sup>5</sup>		Part-time students		Full- time students	Part-time students
			Pell grant recipient <sup>6</sup>	Non-Pell grant recipient <sup>7</sup>	Pell grant recipient	Non-Pell grant recipient		
<b>Number of Eligible Students</b>	How many students were eligible to receive HEERF emergency grants made available under section 18004 of the CARES Act <sup>8</sup> ?	<autofill: sum of #s in row>						
<b>Number of HEERF Student Recipients – Emergency Grants to Students (unduplicate d)</b>	How many students received emergency financial aid grants provided under Section 18004 of the CARES Act? (unduplicated across all HEERF sections)	<autofill: sum of #s in row>						
<b>HEERF Amount Disbursed (Section 18004(a)(1) Student Aid Portion)</b>	What was the amount disbursed directly to students as Emergency Financial Aid Grants under Section 18004(a)(1) of HEERF?	<autofill: sum of #s in row>						
	What is the amount reimbursed <sup>9</sup> to your institution for Emergency	<autofill: sum of #s in row>						

<sup>4</sup> For students in both undergraduate and graduate categories, classify as a graduate student.

<sup>5</sup> For students who had multiple enrollment intensities use the enrollment status at the time of disbursement to determine full-time status or part-time status.

<sup>6</sup> Pell grant recipient refers to a student who received a Pell grant during the applicable financial aid award year (for the first annual report 7/1/19-6/30/20, the second annual report 7/1/20-6/30/21, and the third annual report 7/1/21-6/30/22).

<sup>7</sup> Includes non-FAFSA filers.

<sup>8</sup> See guidance FAQ #9 [here](#).

<sup>9</sup> See FAQ #3 [here](#).

	Financial Aid Grants to students made prior to receiving your Section 18804(a)(1) HEERF grant but after March 27, 2020?							
<b>HEERF Amount Disbursed (18004(a)(1) Institutional Portion)</b>	What was the amount disbursed <i>directly</i> to students as Emergency Financial Aid Grants through the Institutional Portion of Section 18004(a)(1) of HEERF?	<autofill: sum of #s in row>						
	What was the amount of the Institutional Portion of Section 18004(a)(1) of HEERF that was used to recover the cost of reimbursing students for room, board, tuition, or fees? If funds were not used for this purpose, report \$0.	<autofill: sum of #s in row>						
<b>&lt;SKIP LOGIC for those who did not receive these funds&gt; HEERF Amount Disbursed (Section 18004 (a)(2)-HBCUs, TCCUs, MSIs, SIP)</b>	What was the amount disbursed <i>directly</i> to students as Emergency Financial Aid Grants through the HBCUs, TCCUs, MSIs, or SIP portion of the fund? If funds were not used for this purpose, report \$0.	<autofill: sum of #s in row>						
	What was the HBCUs, TCCUs, MSIs, or SIP portion amount used to recover the cost of reimbursing students for room, board, tuition, or fees? If funds were not used for this purpose, report \$0.	<autofill: sum of #s in row>						
<b>&lt;SKIP LOGIC for those who did not receive these funds&gt; HEERF Amount Disbursed</b>	What was the amount disbursed <i>directly</i> to students as Emergency Financial Aid Grants through funds received through Section 18004(a)(3)? If	<autofill: sum of #s in row>						

<b>(Section 18004 (a)(3))</b>	funds were not used for this purpose, report \$0.							
	What was the amount received through Section 18004(a)(3) used to recover the cost of reimbursing students for room, board, tuition, or fees? If funds were not used for this purpose, report \$0.	<autofill: sum of #s in row>						
<b>HEERF Amount of Grants Disbursed</b>	What was the amount of grants disbursed to students through all HEERF funds?	<autofill: calculated from #s above>	<autofill: calculated from #s above >					
<b>Average HEERF Amount Awarded</b>	Among students who received HEERF emergency financial aid grants, what was the average award amount per student?	<autofill: calculated from #s above >						

### Institutional Support (applies to all HEERF grants)

8) Provide the total amount of HEERF funds expended on the categories provided. Please note that the CARES Act prohibits the use of funding for the provision of pre-enrollment recruitment activities; endowments; or capital outlays associated with facilities related to athletics, sectarian instruction, or religious worship. In addition, please note that this template is meant to serve as a guide, and therefore IHEs are not required to categorize amounts in every category listed but only those that IHEs found applicable to their unique circumstances.

Category	Amount expended (in dollars)
Direct grants to students <sup>10</sup>	<Auto-fill from response question 6>
Tuition discounting	

<sup>10</sup> To support any element of the cost of attendance (as defined under Section 472 of the Higher Education Act) per the Interim Final Rule published June 17, 2020. Community Colleges in California and all IHEs in Washington state have different requirements due to U.S. District Court actions. Please discuss with legal counsel.

Providing additional technology to students, such as laptops or tablets	
Providing or subsidizing the cost of highspeed internet to students or faculty forced to transition to the online environment	
Subsidizing off-campus housing costs due to dorm closures or decisions to limit housing to one student per room; subsidizing housing costs to reduce housing density; paying for hotels or other off-campus housing for students who need to be isolated; paying travel expenses for students who need to leave campus early due to coronavirus infection or campus interruptions.	
Subsidizing food service to reduce density in eating facilities, to provide pre-packaged meals, or to add hours to food service operations to accommodate social distancing.	
Operating additional class sections to enable social distancing, which includes hiring more instructors and increasing campus hours of operations	
Purchasing additional instructional equipment and supplies (such as laboratory equipment or computers) to reduce the number of students sharing equipment or supplies during a single class period and to provide time for disinfection between uses.	
Replacing lost tuition revenue due to reduced enrollments	
Replacing lost revenue from non-tuition sources (i.e., cancelled ancillary events; disruption of food service, dorms, childcare or other facilities; cancellation of use of campus venues by other organizations, lost parking revenue, etc. <sup>11</sup>	
Purchasing faculty and staff training for online instruction	
Purchasing additional equipment or software to enable distance learning, or upgrading campus wi-fi access or making wi-fi access available to the public by extending open networks to parking lots or public spaces, etc.	
Campus Safety and Operations <sup>12</sup>	
Revenue-sharing contracts entered into by the institution to manage and implement the transition to distance learning	
Marketing and communications spending	
Other uses of funds. Please provide documentation and explain: _____	
<b>TOTAL AMOUNT</b>	

9) Provide the number of students who received HEERF grant funds and withdrew from the institution within the reporting period.

How many students received emergency financial aid grants through any of the HEERF funds?	How many of students who ever received HEERF Emergency Financial Aid Grants dropped out (withdrawal without a completion record since receiving funds)?	How many of the students who ever received HEERF Emergency Financial Aid Grants are still enrolled at your institution?	How many of the students who ever received HEERF Emergency Financial Aid Grants have completed their program of study at your institution?	Withdrawal rate for students who received HEERF Emergency Financial Aid Grants

<sup>11</sup> Including continuance of pay salary and benefits to workers who would otherwise support the work or activities of ancillary enterprises (i.e. bookstore workers, foodservice workers, venue staff, etc.)

<sup>12</sup> Including disinfecting and cleaning of dorms and other campus facilities, purchase of PPE, purchase of cleaning supplies, adding personnel to increase the frequency of cleaning, reconfiguration of facilities to promote social distancing, etc.

< autofill from above>				<autofill: students who dropped out divided by total number of students who received funds>
<b>How many students were eligible for (based on federal legislation) but did not receive emergency financial aid grants through any of the HEERF funds?</b>	<b>How many of students who were eligible for (based on federal legislation) but did not receive HEERF Emergency Financial Aid Grants dropped out (withdrawal without a completion record since receiving funds)?</b>	<b>How many of the students who were eligible for (based on federal legislation) but did not receive HEERF Emergency Financial Aid Grants are still enrolled at your institution?</b>	<b>How many of the students who were eligible for (based on federal legislation) but did not receive HEERF Emergency Financial Aid Grants have completed their program of study at your institution?</b>	<b>Withdrawal rate for students who were eligible for (based on federal legislation) but did not receive HEERF Emergency Financial Aid Grants</b>
<autofill from above>				<autofill: students who dropped out divided by total number of students who received funds>

10) Provide the full-time equivalent (FTE) positions as of March 13, 2020 and the FTE positions as of the last day of the reporting period.

a)

Number of employees as of:	Instructional Staff (FTE)	Non-instructional Staff (FTE)	Student Undergraduate Employees (FTE)	Student Graduate Employees (FTE)
March 13, 2020				
Last day of the reporting period				